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6 Attorney for Asharon Bravo
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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12
13 v.
14 ASHARON BRAVO,
15 Defendant.

Case No. 2:14-cr-00103-GMN-VCF-1

STIPULATION TO CONTINUE
DEADLINES TO FILE
SUPPLEMENTAL TO MOTION
FOR COMPASSIONATE RELEASE
(ECF NO. 373) AND RESPONSE
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
18 Trutanich, United States Attorney, and Elizabeth Olson White, Assistant United States
19 Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public
20 Defender, and Monique Kirtley, Assistant Federal Public Defender, counsel for Asharon Bravo,
21 that the deadline to the supplement Defendant's Motion for Compassionate Release (ECF No.
22 373) be set for November 2, 2020; and that the deadline for the government's response be
23 extended to November 16, 2020.
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1 This Stipulation is entered into for the following reasons:

2 1. Defendant filed a Pro Se Motion for Compassionate Release on September 28,
3 2020. ECF No. 373.

4 2. Undersigned counsel was assigned to represent Defendant on October 15,
5 2020. ECF No. 374.

6 3. On October 15, 2020, this Court ordered the FPD to file either a Supplement or
7 Notice of Non-Supplementation to Defendant's Motion for Compassionate Release by Monday,
8 October 19, 2020.

9 4. Undersigned counsel needs additional time to review Defendant's pro se motion,
10 medical records and to draft a Supplement, if necessary.

11 5. The additional time requested herein is not sought for purposes of delay but
12 merely to allow counsel for Defendant sufficient time to effectively prepare a Supplement.

13 6. Additionally, denial of this request for continuance could result in a miscarriage
14 of justice.

15 7. After receiving the Supplemental motion, Government counsel will likewise
16 need additional time to review the Supplement and prepare and file the government's response.

17 This is the first request to continue deadlines filed herein.

18 DATED this 15th day of October 2020.

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20 RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

21
22 */s/ Monique Kirtley*
By _____
23 MONIQUE KIRTLEY
24 Assistant Federal Public Defender

/s/ Elizabeth O. White
By _____
ELIZABETH O. WHITE
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 ASHARON BRAVO,

7 Defendant.

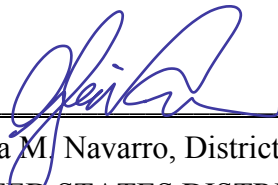
Case No. 2:14-cr-00103-GMN-VCF-1

ORDER

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9 **ORDER**

10 IT IS THEREFORE ORDERED that defense counsel's supplement to Defendant's
11 Motion for Compassionate Release (ECF No. 373) currently due on Monday, October 19, 2020,
12 be vacated and continued to Monday, November 2, 2020; and that the Government's response
13 to Defendant's supplement shall be due on Monday, November 16, 2020.

14 DATED this 17 day of October 2020.

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17 _____
18 Gloria M. Navarro, District Judge
19 UNITED STATES DISTRICT COURT
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